

INTERCOLLEGIATE BROADCASTING SYSTEM

WASHINGTON OFFICE

October 1, 1949

To: Campus Broadcast Stations

From: IBS Committee on FCC Docket 9288

Subject: Docket Status Report

Since notification by the FCC extending the deadline for filing comments on Docket 9288 from June 1st to August 1st, IBS filed a petition and appendices (about 50 pages) with the FCC asking that separate hearings be held for the college stations and that certain amendments to Part 3 of the Rules be adopted to provide for the college stations.

On August 1, 1949 the FCC issued Memorandum Opinion and Order # 38578, Docket No. 9288 separating the Docket into four parts of which only Part D concerns college broadcasting. The FCC also stated that it would issue a Supplemental Notice of Proposed Rule Making in the future and in view of that fact extended the date for filing comments until further notice.

Please note that a hearing has not been held nor has the date been set for one.

A good showing has been made both by and for the campus radio stations with the Commission. The stations received considerable support from educational and public officials as well as from standard broadcast stations. As of August 1st comments had been received by the FCC from 54 colleges, 5 state governors, more than 40 senators and congressmen, and over 50 standard broadcast stations in behalf of campus radio. Statements were also filed by such organizations as NAB, NEA, NAEB, etc. None was unfavorable and there were few differences regarding this method of broadcasting.

The Committee would like to take this opportunity to thank those stations which have taken the time and effort to file comments with the FCC and to suggest that for the present no further comments (unless technical data) be sent to the Commission. We are enclosing a copy of the rules which were proposed by IBS to the FCC and suggest that comments concerning them be sent to the Committee at 2808 Erie Street S.E., Washington 20, D.C.

Those stations which have not filed comments with the FCC and are interested in staying on (or going on) the air will be acting in their best interest by filing comments in the next 30 days. For further information see the letter and enclosures from George Abraham, IBS Chairman, dated April 15, 1949 or write to IBS in Washington.

As new regulations have not yet been promulgated, campus radio still comes under Part 15 of the Commission's Rules governing low power devices. Campus stations which plan to commence or resume operations in the fall may do so provided that they comply with these regulations. According to present indications the impending rules for this service will be considerably more rigid than those now in force -- particularly from the technical viewpoint. It is therefore recommended that high engineering standards be furthered at all campus stations. Such a policy should minimize the technical and equipment changes and



resulting break in operation when the new rules go into effect.

In the FCC's Notice of Proposed Rule Making on April 13 (Docket No. 9288), it was proposed that low power broadcasting on the standard broadcast band be permitted only in accordance with Part 3 of the Commission's Rules, as appropriately amended. There are legal, technical, and other reasons for this. As Part 3 of the Commission's Rules is intended for radio broadcast services, many of its provisions are too rigid for campus broadcasting. It is therefore necessary that this part of the Rules be appropriately amended to include campus stations, as for example the proposal of IBS. The Committee hopes that this will clarify the misunderstanding on the part of several stations concerning Part 3.

Before the new rules can be formulated, additional engineering data on campus stations are needed by the FCC. IBS has been requested to obtain the necessary information by the Commission. It is essential that your station cooperate by providing the data requested by the IBS Engineering Department in the accompanying memorandum and questionnaire. Please answer the questions accurately and completely so that full information may be made available to the Commission. Such data will be considered in determining the technical requirements of the new rules.

The Committee